Seymour Wasserstrum, Esq.

Law Offices of Seymour Wasserstrum 205 W. Landis Ave. Vineland, NJ 08360 (t)856-696-8300 | (f)856-696-3586 MyLawyer7@aol.com

UNITED STATES BANKRUPTCY COURT DISTICT OF NEW JERSEY CAMDEN VICINAGE

In re:		Case No.:	23-17427
	Tanisha I. Green		
	Debtor		

CERTIFICATION OF TANISHA I. GREEN

- I, <u>TANISHA I. GREEN</u>, the Debtor in this case, have personal knowledge of the facts set forth herein, and I am authorized to make this certification.
 - I am filing this certification in opposition to Creditor's Certification of Default,
 Motion for Relief, and to request the court reconsider the ruling of May 22, 2024.
 - 2. I have lived in my home for approximately thirteen years.
 - 3. I have worked for the last 25 + years for Vineland Developmental Center.
 - 4. If Covid had not occurred, I would not have fallen behind in my rent.
 - 5. Fortunately, DCA approved me to receive eviction prevention funds to help me catch up with my rent.
 - 6. The reason that I fell behind in my post-petition rent payments is that while I was approved for rental assistance there was an error made and the DCA funds that were supposed to be sent to my landlord were sent to someone else.

- 7. I filed my bankruptcy petition on <u>August 25,2023</u>. The primary reason I filed, was to save my home and to pay the landlord the pre-petition arrears of \$3,925.00 through my plan.
- 8. Going forward, in regard to post-petition arrears, I owe (9) nine months at <u>\$868.00</u> for a total of **\$8,262.00** including late fees of \$50.00 each month.
- 9. There have been multiple payments made to Goldcrest Properties, a total of \$10,183.00, since August 2023.
- 10. In October 2023, I made a payment of **\$805.00** to the landlord. See attached
- 11. On November 22, 2023, a payment from DCA for the EVICTION PREVENTION PROGRAM in the amount of \$2,325.00 was made to Goldcrest Properties.
- 12. In March 2024, I made a payment of **§500.00** to Goldcrest Properties.
- 13. On May 9, 2024, a payment from DCA from the EVICTION PREVENTION PROGRAM in the amount of \$6,553.00 was made to Goldcrest Properties.
- 14. I am requesting that the automatic stay remain in effect and that I am permitted to continue paying pre-petition arrears in the plan.
- 15. If the court would allow me to list my pre-petition rental arrears in the amount of \$3,925.00 in my chapter 13 bankruptcy plan, I would then owe post-petition rental arrears and late fees totaling \$8,076.00 outside of the plan.
- 16. Payments in the amount of \$\frac{\\$10,183.00}{\$10,183.00}\$ have been made to the landlord since I filed my petition, allowing a \$\frac{\\$1,239.00}{\$1,239.00}\$ credit as of May 31, 2024.
- 17. While deducting what I owe for June 2024, which is **\$868.00**, a credit still remains in the amount of **\$371.00** which I would like to be applied to my July rent.

18. See Table below for quick reference;

September 2023 to June 2024

Date	Rent Amount Due:	Late Fee:	Total Due:	Payment
Sep-23	\$ 775.00	\$ 50.00	\$ 825.00	<u>\$</u> -
Oct-23	\$ 775.00	\$ 50.00	\$ 825.00	\$ -
Oct-24			\$ -	\$ 805.00
Nov-23	\$ 868.00	\$ 50.00	\$ 918.00	\$ -
Nov-23	\$ -		\$ -	\$ 2,325.00
Dec-23	\$ 868.00	\$ 50.00	\$ 918.00	<u>\$</u> -
Jan-24	\$ 868.00	\$ 50.00	\$ 918.00	\$ -
Feb-24	\$ 868.00	\$ 50.00	\$ 918.00	\$ -
Mar-24	\$ 868.00	\$ 50.00	\$ 918.00	\$ -
Mar-24	\$ -		\$ -	\$ 500.00
Apr-24	\$ 868.00	\$ 50.00	\$ 918.00	\$ -
May-24	\$ 868.00	\$ 50.00	\$ 918.00	\$ -
May-24	\$ -	-	\$ -	\$ 6,553.00
TOTAL(s)	\$ 7,626.00		\$ 8,076.00	\$ 10,183.00
CREDIT				\$ 2,107.00
Jun-24	\$ 868.00			\$ 1,239.00 CREDIT

Case 23-17427-ABA Doc 51-1 Filed 06/18/24 Entered 06/18/24 20:02:56 Desc Certification Page 4 of 4

19. At the same time, I do have \$868.00 on hand for June rent, but I was told by the

landlord that I will be locked out for not paying on the 1st of the month.

20. Lastly. I am not opposed to paying reasonable attorney fees and I agree to pay the

creditor's attorney fees of \$650.00 also through the plan, and I want to thank the

Court for giving me the help that I need at this point in my life.

I, TANISHA I GREEN, certify all statements made heretofore by me are true and correct

to the best of my information, knowledge, and belief; and I am fully aware that if any statement is

willfully false, I am subject to punishment for false swearing.

Dated: 06/18/2024	/s/ Tanisha I. Green
<u> </u>	Tanisha I. Green